U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

May 20, 2024

BY ECF

MEMO ENDORSED

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

> Re: *United States v. Trevor Milton*, S1 21 Cr. 478 (ER)

Dear Judge Ramos:

The Government writes regarding restitution in this case. As part of the defendant's sentencing, the Court ordered the imposition of restitution, but left open the amount of restitution to be paid pending receipt of further information from the parties. As the Government informed the Court on March 18, 2024, the parties are negotiating a resolution of the outstanding issues relating to restitution. That negotiation is active and remains ongoing. In light of the number of victims involved and potential complexity of restitution in this case, a resolution has not yet been reached. While 18 U.S.C. § 3664(d)(5) provides for a period of 90 days after sentencing for the Court to order restitution, that provision does not limit the power of the Court to order restitution after the expiration of that period, particularly where additional time is required to administer restitution effectively. *See Dolan v. United States*, 560 U.S. 605, 610-11 (2010). Accordingly, the Government respectfully requests, with the defendant's consent, an additional 90 days to submit a proposed order of restitution to the Court, or if necessary to seek Court intervention in any open issues that cannot be resolved.

The request is granted. The government shall submit the proposed order of restitution by August 19, 2024.
SO ORDERED.

Edgardo Ramos, U.S.D.J.
Dated: May 20, 2024
New York, New York

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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cc: Counsel of Record (by ECF)